

Exhibit 1

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION

FREEDOM COALITION OF DOCTORS FOR
CHOICE,

Plaintiff,
-against-

Civil Action No. 2:23-cv-00102

CENTERS FOR DISEASE CONTROL AND
PREVENTION and DEPARTMENT OF
HEALTH & HUMAN SERVICES,

Defendants.

DECLARATION OF DR. RICHARD BARLETT, M.D.

I, Richard Bartlett, M.D., do hereby declare as follows:

1. I am over the age of 18 years, have personal knowledge of the matters set forth in this Declaration and do so competently.
2. I am one of six Board Members for Freedom Coalition of Doctors for Choice ("Freedom Coalition") and was central towards the formation of the organization.
3. I became aware that Defendants were generally not releasing v-safe free-text data in December 2022, and was deeply concerned by that occurrence as a medical professional.
4. I had other professional colleagues in the medical field who were equally concerned about that occurrence in December 2022, all of whom are located in the Amarillo or Lubbock, Texas areas.
5. To that end, the six of us began to take steps in December 2022 to form Freedom Coalition.
6. The sole purpose of the Freedom Coalition is to serve as a group to obtain the v-safe free-text data from Defendants and then to release it to the public.
7. We retained counsel and directed that counsel to serve a Freedom of Information Act ("FOIA") Request on the Centers for Disease Control for the v-safe free-text data in January 2023.
8. We also took steps to formally incorporate the organization in January 2023 with the Texas Secretary of State, and we rented a virtual office in Amarillo for the purpose of serving as corporate headquarters for the organization. The Freedom Coalition has no employees. It is solely run and decisions are solely made by its board of directors.
9. All board meetings for the Freedom Coalition have occurred from and in Amarillo, Texas. All votes that occurred, occurred at those meetings (the only way in which decisions are or have been made for the organization are through a vote of the board of directors). That included the votes to authorize the FOIA request, to appeal the FOIA denial, and to instruct counsel to file litigation. Those votes were unanimous. No board meetings have been held anywhere other than Amarillo, Texas.
10. The only body that makes or directs and actions for the Freedom Coalition are the board of directors for the Freedom Coalition, by and through its six board members.
11. Three of the six board members of the Freedom Coalition reside and work in Amarillo, Texas (Drs. Pia and Rolf Habersang, and Dr. Deborah Moore). I work in Amarillo, Texas, but reside in Midland, Texas. Two board members work and reside in Lubbock, Texas (Camilla Glenn, APRN, FNP-C and Dr. Paul Thomas).
12. The only place that serves as the Freedom Coalition's headquarters, and the only place

that decisions are or have been made from, is Amarillo, Texas.

Pursuant to 28 U.S.C. §1746, I declare under penalties of perjury under the laws of the United States of America that the foregoing Declaration is true and correct to the best of my knowledge and belief and that such facts are made based on my personal knowledge.

Executed on August 28 2023.

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RICHARD BARTLETT M.D.